

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

LESTER LEE,

PLAINTIFF

v.

BROOKSIDE PARK CONDOMINIUM,
INC., METROPOLIS (aka MCM, INC.),
RAMMY AZOULAY AND LAMONT
SAVOY

DEFENDANTS

Case No. 8:24-cv-01205-ABA

**DEFENDANTS BROOKSIDE PARK CONDOMINIUM, INC., METROPOLIS (aka
MCM, INC.), AND RAMMY AZOULAY’S MOTION TO DISMISS**

COMES NOW, Defendants Brookside Park Condominium, Inc., Metropolis (aka MCM, Inc.), and Rammy Azoulay (Collectively “Brookside”), through their attorneys Anthony D. Dwyer and Eccleston and Wolf, P.C., hereby move to dismiss this case and for grounds therefore state as follows:

1. On April 11, 2025 this Court issued an Order ordering Plaintiff to respond to Defendant’s Interrogatories and document requests by May 11, 2025.
2. Plaintiff failed to comply with the Order.
3. Plaintiff’s counsel emailed and said he needed more time, so no Motion to Dismiss was filed.
4. However, Plaintiff finally answered Interrogatories on 5/14/25. **Exhibit 1.** Even a cursory review shows that these Answers are woefully deficient. **Exhibit 2.** Not a single document was produced and there were no responses to the document requests. All three sets of Answers to

Interrogatories are not signed by Plaintiff. Even more importantly, the Answers to Interrogatories are woefully deficient.

4. Defendant is prejudiced as discovery was served way back in August and there have been many attempts to try to get the written discovery. Accordingly, this Court should dismiss the case for violation of the Discovery Order.

5. *Pro se* Plaintiff filed a pleading and asked for an extension until June 2, 2025 to respond to summary judgment. No response has been received. The Court had already granted one extension to respond to the Motion. The Motion should be deemed conceded and summary judgment should be entered in favor of Defendants.

Memorandum of Points and Authorities

This court's Order of 4/11/25 compelling discovery and the Order extending time to respond to summary judgment.

Respectfully submitted,

/s/Anthony D. Dwyer

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4th day of June 2025, copies of the foregoing **DEFENDANTS BROOKSIDE PARK CONDOMINIUM, INC., METROPOLIS (aka MCM, INC.), AND RAMMY AZOULAY'S MOTION TO DISMISS** were served by first-class mail, postage prepaid and electronic mail to:

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